

1 Maria A. Gall (NV 14200)
2 gallm@ballardspahr.com
3 BALLARD SPAHR LLP
4 1980 Festival Plaza Drive, Suite 900
5 Las Vegas, NV 89135
6 Tel.: 702-471-7000
7 Fax: 702-471-7070

8 Logan D. Smith (*Pro Hac Vice*)
9 lsmith@mcnamarallp.com
10 McNAMARA SMITH LLP
11 655 West Broadway, Suite 900
12 San Diego, California 92101
13 Tel.: 619-269-0400
14 Fax: 619-269-0401

15 *Attorneys for Court-Appointed Monitor,*
16 *Thomas W. McNamara*

17

18 UNITED STATES DISTRICT COURT

19 DISTRICT OF NEVADA

20 FEDERAL TRADE COMMISSION,
21 Plaintiff,
22 v.
23 AMG SERVICES, INC., et al.,
24 Defendants, and
PARK 269 LLC, et al.,
Relief Defendants.

25 Case No. 2:12-cv-00536-GMN-VCF

26 **MOTION FOR LEAVE TO WITHDRAW
27 SANJAY BHANDARI AS COUNSEL OF
28 RECORD**

29

30 Pursuant to LR IA 11-6, Thomas W. McNamara, the Court-Appointed Monitor, by and
31 through his attorney of record, hereby moves this Court for an Order permitting Sanjay Bhandari
32 to withdraw as counsel in the above-captioned case due to his departure from the firm
33 McNamara Smith LLP. This motion is supported by the accompanying memorandum of points
34 and authorities and all pleadings and papers on file in this action.

35

MEMORANDUM OF POINTS AND AUTHORITIES

36

37 As of October 5, 2021, Sanjay Bhandari is no longer associated with McNamara Smith
38 LLP. LR IA 11-6(b) provides that “[i]f an attorney seeks to withdraw after appearing in a case,
39 the attorney must file a motion or stipulation and serve it on the affected client and opposing

1 counsel.” Thomas W. McNamara has consented to Mr. Bhandari’s withdrawal. By
2 electronically filing this motion, it will be served via the Court’s CM/ECF system.

3 Additionally, “[e]xcept for good cause shown, no withdrawal or substitution will be
4 approved if it will result in delay of discovery, the trial, or any hearing in the case.”
5 LR IA 11-6(e). The withdrawal of Mr. Bhandari will not result in delay of discovery, the trial, or
6 any hearing in the case. Maria A. Gall of Ballard Spahr LLP and Logan D. Smith of McNamara
7 Smith LLP will continue to act as counsel for Mr. McNamara.

8 For the reasons set forth above, the Monitor respectfully requests the Court enter an order
9 granting leave for Sanjay Bhandari to withdraw as counsel of record for Thomas W. McNamara.
10 Additionally, Mr. Bhandari should be removed from all future mailings and notices with respect
11 to this case.

12 Dated: October 11, 2021

MCNAMARA SMITH LLP

13
14 By: /s/ Logan D. Smith
15 Logan D. Smith (*Pro Hac Vice*)
16 lsmith@mcnamarallp.com
17 655 West Broadway, Suite 900
18 San Diego, California 92101
19 Tel.: 619-269-0400
20 Fax: 619-269-0401

21
22 Maria A. Gall (NV 14200)
23 gallm@ballardspahr.com
24 BALLARD SPAHR LLP
25 1980 Festival Plaza Drive, Suite 900
26 Las Vegas, NV 89135
27 Tel.: 702-471-7000
28 Fax: 702-471-7070

Attorneys for Court-Appointed Monitor,
Thomas W. McNamara

23 IT IS SO ORDERED.

24
25 
26

27 Cam Ferenbach
28 United States Magistrate Judge

DATED 10-18-2021

CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of October, 2021, pursuant to Fed. R. Civ. P. 5(b), I served via CM/ECF or delivered by email and mailing in the U.S. Mail a true and correct copy of the foregoing **MOTION FOR LEAVE TO WITHDRAW SANJAY BHANDARI AS COUNSEL OF RECORD**, postage prepaid and addressed to the following:

VIA CM/ECF

Kimberly L. Nelson
Federal Trade Commission
600 Pennsylvania Ave. NW
Mail Stop CC-9528
Washington, DC 20580
Tel.: 202-326-3304
Fax: 202-326-3197
Email: knelson@ftc.gov
Attorneys for FTC

VIA CM/ECF

Paul C. Ray
Paul C. Ray, Chtd.
8670 West Cheyenne Avenue, Suite 130
Las Vegas, NV 89129
Tel.: 702-823-2292
Fax: 702- 823-2384
Email: paulcraylaw@gmail.com
*Attorneys for AMG Capital Management, LLC;
Level 5 Motorsports, LLC; Black Creek
Capital Corporation; Broadmoor Capital
Partners, LLC; Scott A. Tucker; Park 269 LLC*

VIA EMAIL

Kim Tucker
7118 Village Drive
Prairie Village, KS 66208
kim@kmtucker.net
Pro Se

/s/ Logan D. Smith
Logan D. Smith
*Attorneys for the Court-Appointed Monitor,
Thomas W. McNamara*